REMARKS

I. Introduction

Claims 1-28 are pending.

The Examiner rejects claims 1-3, 8, 9, 14-16, 22, 23, and 28 under 35 U.S.C. § 102(b) as being anticipated by Kajita U.S. Patent Application No. 2002/0047065 (hereinafter "Kajita"). The Examiner objects to claims 4-7, 10-13, 17-21, and 24-27 as being dependent upon a rejected base claim, but indicates that these claims would be allowable if rewritten in independent form to include all the features of the base claim and any intervening claims.

The Examiner's rejection is respectfully traversed.

II. Applicants' Invention

Applicants' invention, as set forth by independent claims 1 and 15, is directed toward an apparatus and method for disposing a wire lead along a trajectory having predetermined positional references relative to a dynamo-electric machine component. In particular, a wire lead manipulator having first and second portions is configured to dispose the wire lead along the trajectory at the predetermined positional references. The first portion of the manipulator being configured to receive the wire lead from a wire lead source. The second

portion of the manipulator being configured to engage the wire lead received within the first portion. And, a distal end of the wire lead manipulator exclusively enters a first plane in which the wire lead is to be disposed.

Therefore, by having only the distal end of the wire lead manipulator enter the plane in which the wire lead is to be disposed, applicants' claimed approach enables the manipulator to enter within extremely narrow gaps on a dynamo-electric machine component, gaps which do not allow the passage of conventional wire lead manipulator apparatus.

III. Applicants' Claims are Patentable over Kajita

Applicants submit that independent claims 1 and 15 are patentable over Kajita at least because Kajita fails to show or even suggest that a distal end of the wire lead manipulator exclusively enters a first plane in which the wire lead is to be disposed, as required by applicants' claims.

Kajita is directed to apparatus for winding wire coils around the poles (i.e., winding parts 3) of a stator, which is a completely different operation than applicants' objective of disposing a wire lead along a predetermined trajectory on a dynamo-electric component. The Examiner contends that retaining jig 11 of Kajita anticipates the features of applicants' independent claims and that the

"dashed lines in Figure 1" of Kajita show applicants' claimed feature of a distal portion of the wire manipulator that exclusively enters the plane in which the wire lead is to be disposed (Office action, page 2). Applicants respectfully disagree.

Applicants submit the dashed lines in FIG. 1 of Kajita merely represent the retaining jig (one of four shown in FIG. 1) located at the lower right corner and partially hidden behind the stator. Similar to the three other retaining jigs shown in FIG. 1, which are positioned outside of the stator, the partially hidden retaining jig is also positioned outside of the stator. In fact, none of the retaining jigs of Kajita enter the stator, where wire W is being deposited around winding portions 3, even in operation.

Kajita states:

> Concerning the retaining jig 11 shown on the upper right of FIG. 1, the hook 14 has a shape such that when the cam plate 12 rotates downwards at a predetermined angle due to the rotation of the rotation shaft 13 and the opening part 15a of the retaining part 15 is directed downwards obliquely, the wire W held in the retaining part 15 falls down naturally. The other hooks 14 have shapes which perform identical functions.

(Kajita, ¶ 29, emphasis added)

Therefore, in stark contrast with applicants' wire manipulator, a distal end of which exclusively enters a first plane to disposes the wire lead along a predetermined trajectory, Kajita's jig 11 merely retains

wire W before rotating to allow the wire to naturally fall down onto winding part 3 (Kajita, ¶ 35). Nowhere does Kajita show or even suggest that retaining jig 11 is configured to enter within a plane of the stator where wire W is being deposited to form a coil around winding parts 3. In fact, Kajita teaches away from such an approach, as the entire idea behind jig 11 is to guide wire W without entering the limited spaces in and around the stator.

Accordingly, at least because Kajita fails to show or suggest all of the features of applicants' independent claims, applicants submit that claims 1-3, 8, 9, 14-16, 22, 23, and 28 are patentable over Kajita.

V. Conclusion

In view of the foregoing, this application is in condition for allowance. Reconsideration and allowance are respectfully requested.

Respectfully submitted,

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